

**U.S. DEPARTMENT OF ENERGY  
OFFICE OF ENERGY EFFICIENCY AND RENEWABLE ENERGY  
NEPA DETERMINATION**



**RECIPIENT:** Ballard US Inc

**STATE:** TX

**PROJECT TITLE :** Ballard PEM Electrode Assembly Manufacturing and Automated Stack Assembly US Operation

<b>Funding Opportunity Announcement Number</b>	<b>Procurement Instrument Number</b>	<b>NEPA Control Number</b>	<b>CID Number</b>
DE-FOA-0002922	DE-EE0011342	GFO-0011342-001	GO11342

**Based on my review of the information concerning the proposed action, as NEPA Compliance Officer (authorized under DOE Policy 451.1), I have made the following determination:**

**CX, EA, EIS APPENDIX AND NUMBER:**

Description:

**A9 Information gathering, analysis, and dissemination**

Information gathering (including, but not limited to, literature surveys, inventories, site visits, and audits), data analysis (including, but not limited to, computer modeling), document preparation (including, but not limited to, conceptual design, feasibility studies, and analytical energy supply and demand studies), and information dissemination (including, but not limited to, document publication and distribution, and classroom training and informational programs), but not including site characterization or environmental monitoring. (See also B3.1 of appendix B to this subpart.)

**B1.31 Installation or relocation of machinery and equipment**

Installation or relocation and operation of machinery and equipment (including, but not limited to, laboratory equipment, electronic hardware, manufacturing machinery, maintenance equipment, and health and safety equipment), provided that uses of the installed or relocated items are consistent with the general missions of the receiving structure. Covered actions include modifications to an existing building, within or contiguous to a previously disturbed or developed area, that are necessary for equipment installation and relocation. Such modifications would not appreciably increase the footprint or height of the existing building or have the potential to cause significant changes to the type and magnitude of environmental impacts.

**B3.6 Small-scale research and development, laboratory operations, and pilot projects**

Siting, construction, modification, operation, and decommissioning of facilities for smallscale research and development projects; conventional laboratory operations (such as preparation of chemical standards and sample analysis); and small-scale pilot projects (generally less than 2 years) frequently conducted to verify a concept before demonstration actions, provided that construction or modification would be within or contiguous to a previously disturbed or developed area (where active utilities and currently used roads are readily accessible). Not included in this category are demonstration actions, meaning actions that are undertaken at a scale to show whether a technology would be viable on a larger scale and suitable for commercial deployment.

Rationale for determination:

The U.S. Department of Energy (DOE) is proposing to provide federal funding to Ballard US Inc. (Ballard) to install a membrane electrode assembly (MEA) manufacturing line, stack assembly line, and factory acceptance testing (FAT) operation within their Rockwall Gigafactory facility in Rockwall, Texas, which is in the early stages of construction. Construction of the Rockwall Gigafactory is not being funded by DOE and is not considered a connected action.

Separately from this award (DE-EE0011342), additional DOE funds (DE-EE0011346) have been awarded to Ballard to install a Bipolar Plate (BPP) manufacturing line within their new facility. The BPP manufacturing line is considered a connected action because it is federally funded and would be installed concurrently with the manufacturing lines installed under this award. Potential impacts of the BPP manufacturing line installation are considered in this NEPA Determination.

Award activities would be executed over three budget periods (BP). BP1 activities include stakeholder outreach, identification of suppliers, laboratory research and testing, and developing methods and materials for future operations. BP2 activities would include the continuation of activities in BP1 as well as material, software, and services procurement. BP3 activities would include equipment installation, commissioning of the lines, and validation testing.

Award activities would occur entirely within purpose-built manufacturing facilities. The new facility has been designed to house the manufacturing lines and award activities. No new modifications to the facility would be required. No change in the use, mission, or operation of existing facilities would arise out of this effort.

Air emissions may occur from routine operation of the manufacturing lines and would be mitigated through operation

under facility-wide permits. Award activities would involve hazards typical of manufacturing facilities such as loud work environments, operation of machinery, and working with hazardous materials. Hazardous materials and hazardous waste would be handled, managed, stored, and disposed of in accordance with applicable federal, state, and local environmental regulation. Hazards would be mitigated via existing corporate health and safety policies and procedures, including employee training, proper protective equipment, engineering controls, monitoring, and internal assessments.

DOE has considered the scale, duration, and nature of the proposed activities to determine potential impacts on sensitive resources, including those of an ecological, historical, cultural, and socioeconomic nature, and found no effects that would be expected to result from the proposed project activities.

## NEPA PROVISION

DOE has made a final NEPA determination.

Notes:

Hydrogen and Fuel Cell Technologies Office (HFTO)  
NEPA review completed by Amy Lukens, 6/12/2024.

## FOR CATEGORICAL EXCLUSION DETERMINATIONS

The proposed action (or the part of the proposal defined in the Rationale above) fits within a class of actions that is listed in Appendix A or B to 10 CFR Part 1021, Subpart D. To fit within the classes of actions listed in 10 CFR Part 1021, Subpart D, Appendix B, a proposal must be one that would not: (1) threaten a violation of applicable statutory, regulatory, or permit requirements for environment, safety, and health, or similar requirements of DOE or Executive Orders; (2) require siting and construction or major expansion of waste storage, disposal, recovery, or treatment facilities (including incinerators), but the proposal may include categorically excluded waste storage, disposal, recovery, or treatment actions or facilities; (3) disturb hazardous substances, pollutants, contaminants, or CERCLA-excluded petroleum and natural gas products that preexist in the environment such that there would be uncontrolled or unpermitted releases; (4) have the potential to cause significant impacts on environmentally sensitive resources, including, but not limited to, those listed in paragraph B(4) of 10 CFR Part 1021, Subpart D, Appendix B; (5) involve genetically engineered organisms, synthetic biology, governmentally designated noxious weeds, or invasive species, unless the proposed activity would be contained or confined in a manner designed and operated to prevent unauthorized release into the environment and conducted in accordance with applicable requirements, such as those listed in paragraph B(5) of 10 CFR Part 1021, Subpart D, Appendix B.

There are no extraordinary circumstances related to the proposed action that may affect the significance of the environmental effects of the proposal.

The proposed action has not been segmented to meet the definition of a categorical exclusion. This proposal is not connected to other actions with potentially significant impacts (40 CFR 1508.25(a)(1)), is not related to other actions with individually insignificant but cumulatively significant impacts (40 CFR 1508.27(b)(7)), and is not precluded by 40 CFR 1506.1 or 10 CFR 1021.211 concerning limitations on actions during preparation of an environmental impact statement.

The proposed action is categorically excluded from further NEPA review.

## SIGNATURE OF THIS MEMORANDUM CONSTITUTES A RECORD OF THIS DECISION.

NEPA Compliance Officer Signature: \_\_\_\_\_

 Electronically  
Signed By: **Melissa Parker**  
NEPA Compliance Officer

Date: 6/18/2024

## FIELD OFFICE MANAGER DETERMINATION

- Field Office Manager review not required  
 Field Office Manager review required

## BASED ON MY REVIEW I CONCUR WITH THE DETERMINATION OF THE NCO :

Field Office Manager's Signature: \_\_\_\_\_

Field Office Manager

Date: \_\_\_\_\_